

REMARKS/ARGUMENTS

Claims 1-32 are pending in the application. The Examiner has rejected claims 1-32. Applicant has amended claims 1-3, 17, 18, and 32. Applicant has added new claims 33-44. Applicant respectfully requests reconsideration of claims 1-44.

The Examiner has rejected claims 1-2 under 35 U.S.C. §102(e) as allegedly being anticipated by Choi, et al. (US Patent No. 7,293,236). Applicant respectfully disagrees.

Regarding claims 1 and 2, Applicant has amended claims 1 and 2. Applicant submits no new matter has been added. Applicant notes support for such amendments exists in the specification, for example, in Figures 4 and 5 and on page 21, line 14, through page 24, line 15. Applicant submits the cited portions of the cited reference fail to anticipate the subject matter of claims 1 and 2, as amended. As one example, Applicant submits the cited portions of the cited reference fail to disclose "wherein configuration parameters for said second one of said plurality of configurable Input/Output ports are set using a browser interface to said first electronic device" and "setting configuration parameters for said second one of said plurality of configurable Input/Output ports using a browser interface to said first electronic device."

Moreover, Applicant notes MPEP § 2131 states as follows:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ... "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)...."

As one example, Applicant submits the cited portions of the cited reference fail to disclose "...a plurality of configurable Input/Output ports...." Thus, Applicant submits the Examiner has failed to make a *prima facie* showing of anticipation with respect to claims 1 and 2. While the Examiner cites "(see Fig. 1, where first electronic device is considered control point [100], and column 4, lines 7-12, describing a plurality of ports)," Applicant notes column 4, lines 7-12, merely states, "Referring to FIG. 1, a home network environment includes a plurality of controlled devices 150a and 150b and a control device (or control point) 10 interconnected by a communication channel for a home network

(IEEE 1394 bus, Home Phoneline Networking Alliance (HPNA), or Internet, for example)." Applicant submits such teaching merely discloses "controlled devices 150a and 150b," "a control device (or control point) 10", and "a communication channel for a home network," not "...a plurality of configurable Input/Output ports...."

As another example, Applicant notes the Examiner cites "(see column 4, lines 7-12, where a network connection is considered an Internet connection to the electronic device [100])" as allegedly disclosing "a network connection to said first electronic device on a first one of said plurality of configurable Input/Output ports." However, Applicant sees no teaching as to "...an Internet connection to the electronic device [100]..." in column 4, lines 7-12, as cited by the Examiner. Thus, Applicant submits the Examiner has failed to make a *prima facie* showing of anticipation as to claims 1 and 2.

As yet another example, Applicant notes the Examiner cites "(see Fig. 1, showing how a second device washing machine [150b] is connected and column 4, lines 7-12, describing possible Input/Output port connections), wherein said first electronic device serves web pages associated with said at least one second electronic device (see Fig 1 [110], showing how first electronic device serves a guiding web page)." However, Applicant notes the Examiner characterizes such alleged teaching only as "...describing possible Input/Output port connections...." not as actually disclosing "...a second one of said plurality of configurable Input/Output ports." Applicant further submits the Examiner does not allege any teaching as to "...configurable...." Thus, Applicant submits the Examiner has failed to make a *prima facie* showing of anticipation as to claims 1 and 2.

Also, while the Examiner alleges "...Choi discloses an apparatus...," Applicant submits the Examiner does not allege Choi discloses a method for providing universal web access functionality in accordance with claim 2. Thus, Applicant submits the Examiner has not made a *prima facie* showing of anticipation with respect to claim 2. Therefore, Applicant submits claims 1 and 2 are in condition for allowance.

The Examiner has rejected claims 3-5, 10-12, 15, 18-20, 25-27 and 30 under 35 U.S.C. §103(a) as allegedly being unpatentable over Choi, et al. (US Patent No. 7,293,236) in view of Schwartz, et al. (US Patent No. 6,836,796). Applicant respectfully disagrees.

Regarding claims 3 and 18, Applicant has amended claims 3 and 18. Applicant submits no new matter has been added. Applicant notes support for such amendments exists in the specification, for example, in Figures 4 and 5 and on page 21, line 14, through page 24, line 15. Applicant submits the cited portions of the cited reference fail to anticipate or render unpatentable the subject matter of claims 3 and 18, as amended. As one example, Applicant submits the cited portions of the cited reference fail to disclose "wherein configuration parameters for said plurality of configurable Input/Output ports are set using said interface device" and "setting configuration parameters for said plurality of configurable Input/Output ports using said interface device."

Moreover, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 3 and 18. As one example, Applicant submits the cited portions of the cited reference fail to render obvious "a plurality of configurable Input/Output ports for connection to at least one electronic device" and "providing a plurality of configurable Input/Output ports for connection to at least one electronic device." Thus, Applicant submits the Examiner has failed to make a *prima facie* showing of obviousness with respect to claims 3 and 18. While the Examiner cites "(see Fig. 1, where electronic device is considered washing machine [150b], and column 4, lines 7-12, describing a plurality of ports that can be used to connect to the at least one electronic device)," Applicant notes column 4, lines 7-12, merely states, "Referring to FIG. 1, a home network environment includes a plurality of controlled devices 150a and 150b and a control device (or control point) 10 interconnected by a communication channel for a home network (IEEE 1394 bus, Home Phoneline Networking Alliance (HPNA), or Internet, for example)." Applicant submits such teaching merely discloses "controlled devices 150a and 150b," "a control device (or control point) 10," and "a communication channel for a home network," not "...a plurality of configurable Input/Output ports...." Thus, Applicant submits the Examiner has failed to make a *prima facie* showing of obviousness as to claims 3 and 18. Therefore, Applicant submits claims 3 and 18 are in condition for allowance.

Regarding claims 4 and 19, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 4 and 19. As one example, Applicant submits the cited portions of the cited reference fail to render obvious "wherein said plurality of configurable Input/Output ports comprises analog Input/Output ports" and "wherein said plurality of configurable Input/Output ports comprises analog Input/Output ports." Applicant notes the Examiner cites "(see column 4, lines 7-12, where analog ports are considered HPNA)." However, Applicant submits

"HPNA" fail to disclose "...analog Input/output ports." Therefore, Applicant submits claims 4 and 19 are in condition for allowance.

Regarding claims 5 and 20, Applicant has presented arguments for the allowability of claims 3 and 18 from which claims 5 and 20 depend. Therefore, Applicant submits claims 5 and 20 are also in condition for allowance.

Regarding claims 10 and 25, Applicant has presented arguments for the allowability of claims 3 and 18 from which claims 10 and 25 depend. Therefore, Applicant submits claims 10 and 25 are also in condition for allowance.

Regarding claims 11 and 26, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 11 and 26. As one example, Applicant submits the cited portions of the cited reference fail to render obvious "wherein said interface device comprises a configurable graphical user interface" and "wherein said interface device comprises a configurable graphical user interface." Applicant notes the Examiner cites "(see column 4, lines 18-22)" of the Schwartz reference. However, Applicant submits such portion of the Schwartz reference fails to disclose "a configurable graphical user interface." Therefore, Applicant submits claims 11 and 26 are in condition for allowance.

Regarding claims 12 and 27, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 12 and 27. As one example, Applicant submits the cited portions of the cited reference fail to render obvious "wherein said interface device comprises a network interface card" and "wherein said interface device comprises a network interface card." Applicant notes the Examiner cites "(see column 4, lines 18-22, where *interacting through network [102] inherently comprises a network interface card to connect to network [102]*)" of the Schwartz reference. While the Examiner asserts a rejection based on inherency, Applicant submits that the teachings of the cited reference fail to establish inherency in accordance with existing law. For example, Applicant submits that the Examiner has failed to establish that the public gained the benefit of the subject matter recited in claims 12 and 27 from the teachings of the cited reference. *Schering Corp. v. Geneva Pharmaceuticals*, 339 F.3d 1373 (Fed. Cir. 2003). As another example, Applicant submits that the Examiner has failed to establish that the subject matter recited in claims 12 and 27 is present in the teachings of the cited reference. *Mentor v. Medical Device Alliance*, 244 F.3d 1365

(Fed. Cir. 2001); *Scaltech v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999). Thus, Applicant submits that the subject matter recited in claims 12 and 27 cannot be considered to be inherent in the teachings of the cited reference. Accordingly, Applicant submits the Examiner has failed to satisfy the burden of proof required for asserting a rejection based on inherency. Therefore, Applicant submits that the Examiner has not shown claims 12 and 27 to be rendered unpatentable by the cited references. Consequently, Applicant submits claims 12 and 27 are in condition for allowance.

Regarding claims 15 and 30, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 15 and 30. As one example, Applicant submits the cited portions of the cited reference fail to render obvious "wherein said at least one electronic device is not web enabled" and "wherein said at least one electronic device is not web enabled." Applicant notes the Examiner cites "(see column 4, lines 7-12, *where the device that connects via IEEE 1394 is not web enabled*)" of the Choi reference. However, Applicant submits such portion of the Choi reference fails to disclose "wherein said at least one electronic device is not web enabled," as Applicant submits merely connecting via a IEEE 1394 interface does not disclose that a device is not web enabled. Therefore, Applicant submits claims 15 and 30 are in condition for allowance.

The Examiner has rejected claims 6-9 and 21-25 under 35 U.S.C. §103(a) as allegedly being unpatentable over Choi, et al. (US Patent No. 7,293,236) in view of Schwartz, et al. (US Patent No. 6,836,796), and further in view of Axelson ("Serial Port Central"). Applicant respectfully disagrees.

Regarding claims 6-9 and 21-25, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 6-9 and 21-25. While the Examiner relies on the Axelson reference as allegedly disclosing "old and well known serial port communication standards that are used to connect devices," Applicant notes the date in the bottom margin of the Axelson reference is "11/19/07," which is more than four years after the filing of the present application and more than five years after the filing date of the provisional application to which the present application claims priority. The Examiner presents no evidence as to how the Examiner has allegedly determined that a document prepared years after the filing date would relate to what one of ordinary skill in the art would have known at the time of invention. Thus, Applicant submits the Examiner has not established a *prima facie* showing of unpatentability with respect to the subject matter of claims 6-9 and 21-25. Therefore, Applicant submits claims 6-9 and 21-25 are in condition for allowance.

The Examiner has rejected claims 13 and 28 under 35 U.S.C. §103(a) as allegedly being unpatentable over Choi, et al. (US Patent No. 7,293,236) in view of Schwartz, et al. (US Patent No. 6,836,796), and further in view of Computer Hope ("Computer Hardware"). Applicant respectfully disagrees.

Regarding claims 13 and 28, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 13 and 28. While the Examiner relies on the Computer Hope ("Computer Hardware") reference as allegedly disclosing "the components of a network interface card (see page 1, 'NIC ABCs') and how an RJ45 connector is one of the most popular types of connections used with computer networks (see page 2, 'RJ45')," Applicant notes the date in the bottom margin of the Computer Hope ("Computer Hardware") reference is "11/20/07," which is more than four years after the filing of the present application and more than five years after the filing date of the provisional application to which the present application claims priority. The Examiner presents no evidence as to how the Examiner has allegedly determined that a document prepared years after the filing date would relate to what one of ordinary skill in the art would have known at the time of invention. Thus, Applicant submits the Examiner has not established a *prima facie* showing of unpatentability with respect to the subject matter of claims 13 and 28. Therefore, Applicant submits claims 13 and 28 are in condition for allowance.

The Examiner has rejected claims 14 and 29 under 35 U.S.C. §103(a) as allegedly being unpatentable over Choi, et al. (US Patent No. 7,293,236) in view of Schwartz, et al. (US Patent No. 6,836,796), and further in view of Fifield (US Patent No. 7, 130,670). Applicant respectfully disagrees.

Regarding claims 14 and 29, Applicant has presented arguments for the allowability of claims from which claims 14 and 29 depend. Therefore, Applicant submits claims 14 and 29 are also in condition for allowance.

The Examiner has rejected claims 16-17 and 31-32 under 35 U.S.C. §103(a) as allegedly being unpatentable over Choi, et al. (US Patent No. 7,293,236) in view of Schwartz, et al. (US Patent No. 6,836,796), and further in view of McConnell, et al. (US Patent No. 6,822,954). Applicant respectfully disagrees.

Regarding claims 16 and 31, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 16 and 31. Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 16 and 31. The Examiner acknowledges the Choi reference in view of the Schwartz reference "fails to disclose that the server engine comprises a flattened stack handler for processing an Ethernet packet, a server-side include function, a URL encoder/decoder function; and an electronic mail notification handler." The Examiner alleges "McConnell discloses a server (i.e., gateway) that provides an interface to allow access to external entities in a versatile manner (see Abstract)." The Examiner also states, "Further showing that the gateway comprises well known server capabilities such as, a flattened stack handler for processing a packet; a server-side include function; a URL encoder/decoder function (see column 5, lines 15-30, *describing different stacks for processing packets (i.e. WDP) and an HTTP client with encoder and a server-side include function in the form an API*); and an electronic mail notification handler (see column 13, lines 9-15, describing how the gateway can be notified if an SMS message is received)." Applicant respectfully disagrees.

As an example, Applicant submits the cited portion of the cited reference teaches away from a "server engine." Applicant notes the Abstract of the McConnell reference states "A gateway has...an HTTP client...." Thus, Applicant submits the gateway of McConnell teaches away from a "server engine." As another example, Applicant submits the cited portion of the cited reference fails to disclose "a flattened stack handler for processing an ethernet packet." Applicant notes "column 5, lines 15-30," as cited by the Examiner discloses "a stack 20," but does not disclose "a flattened stack handler." Moreover, Applicant submits the Examiner cites "WDP" as being an example of "different stacks." However, Applicant notes "WDP" is described as "a wireless datagram protocol (WDP) layer 21," not as a stack. Thus, Applicant submits the Examiner has mischaracterized the teachings of the cited reference. Applicant further notes the cited portion of the cited reference fails to disclose "...for processing an ethernet packet."

As another example, Applicant submits the cited portion of the cited reference fails to disclose "a server-side include function." While the Examiner cites, "...*a server-side include function in the form an API*," Applicant notes the cited portion of the cited reference merely discloses "a push API 27," not "a server-side include function." As yet another example, Applicant submits the cited portion of the cited reference fails to disclose "a URL encoder/decoder function." While the Examiner states, "*an HTTP client with encoder*," Applicant notes the cited portion of the cited reference discloses "a

compiler/encoder (C/E) 28, a HTTP client 29." Applicant notes the cited portion of the cited reference discloses "compiler/encoder (C/E) 28" and "HTTP client 29" as distinct elements, not as "*an HTTP client with encoder.*" Moreover, Applicant submits "a compiler/encoder (C/E) 28" fails to disclose "a URL encoder/decoder." Furthermore, Applicant notes the Examiner has not alleged any teaching as to "decoder." Thus, Applicant submits the Examiner has failed to make a *prima facie* showing of unpatentability with respect to claims 16 and 31. Additionally, as noted above, Applicant submits the teaching of the cited portion of the cited reference as to a "HTTP client" teaches away from a "server engine." Therefore, Applicant submits claims 16 and 31 are in condition for allowance.

Regarding claims 17 and 32, Applicant submits the cited portions of the cited references fail to anticipate or render unpatentable the features of claims 17 and 32. Applicant notes the Examiner states, "(see McConnell column 5, lines 52-55, where TCP/IP implies a TCP packet which inherently comprises IP header, TCP header and payload)." While the Examiner asserts a rejection based on inherency, Applicant submits that the teachings of the cited reference fail to establish inherency in accordance with existing law. For example, Applicant submits that the Examiner has failed to establish that the public gained the benefit of the subject matter recited in claims 17 and 32 from the teachings of the cited reference. *Schering Corp. v. Geneva Pharmaceuticals*, 339 F.3d 1373 (Fed. Cir. 2003). As another example, Applicant submits that the Examiner has failed to establish that the subject matter recited in claims 17 and 32 is present in the teachings of the cited reference. *Mentor v. Medical Device Alliance*, 244 F.3d 1365 (Fed. Cir. 2001); *Scaltech v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999). Thus, Applicant submits that the subject matter recited in claims 17 and 32 cannot be considered to be inherent in the teachings of the cited reference. Accordingly, Applicant submits the Examiner has failed to satisfy the burden of proof required for asserting a rejection based on inherency. Therefore, Applicant submits that the Examiner has not shown claims 17 and 32 to be rendered unpatentable by the cited references.

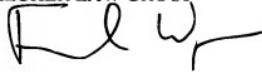
Moreover, Applicant notes the Examiner cites "(see McConnell column 6, lines 5-36, *describing how TCP sockets and ports (implying the Ethernet header, IP heard and TCP header), are only allowed access with an active service with a valid user.*)" Applicant respectfully disagrees. Applicant submits the cited portion of the cited reference teaches reliance on a "Service User ID and Password" for authentication (column 6, lines 32-35). Thus, Applicant submits the cited portion of the cited reference teaches away from the subject matter of claim 17 and 32. Consequently, Applicant submits claims 17 and 32 are in condition for allowance.

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Applicant has added new claims 33-44. Applicant notes support for new claims 33-44 is found in the specification, for example, from page 23, line 6, through page 24, line 15. Thus, Applicant submits no new matter has been added. Applicant submits claims 33-44 are in condition for allowance.

Respectfully Submitted,

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